

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE:** : Chapter 13  
**Woods, Davy**  
**Woods, Angela B**  
**Debtors** : 19-11128

**OBJECTION TO  
CERTIFICATION OF DEFAULT**

Debtors through their counsel, hereby objects to FREEDOM MORTGAGE CORPORATION's (hereinafter "Mortgage Company") "Certificate of Default" with a proposed attached "Order Modifying Section 362 Automatic Stay" that seeks the inapplicability of Federal Bankruptcy Rules. Debtors by and through their counsel in support thereof avers as follows:

1. On August 18, 2022, the Bankruptcy Court's ECF docket report showed that Movant's counsel filed a "Certification of Default" dated August 18, 2022 that certified that "Debtors failed to cure the default" and seeking "relief from the automatic stay.
2. As of the date of this Objection, Joint Debtor contacted counsel and claims the payments were made and she is in the process of tracing the missing checks. Moreover, Debtors will remedy and/or is prepared to remedy whatever problem served as grounds for relief in respect to the Stipulation, if any ever existed.
3. To the extent that Mortgage Company has an interest in the debtor's estate, such interest is adequately protected pursuant to the Bankruptcy Code.
4. The Debtors have substantial equity in their property and movant has been afforded adequate protection of its interest.
5. Even if Movant is entitled to relief from the stay, the stay should not be terminated. The Court should grant less drastic relief by conditioning or modifying the stay.
6. Movant has not shown the irreparable harm necessary to justify lifting the stay with respect to its foreclosure.

For the reasons set forth above, among others, and based on this Court's authority under the Bankruptcy Code, the Debtors pray denial of consideration or the entry of the Mortgage Company's "Order Modifying Section 362 Automatic Stay" and such other relief as is just and proper. The Debtors specifically reserve the right to supplement the answer at or prior to the hearing thereon.

Dated: August 24, 2022

/s"/Mitchell J. Prince, Esquire  
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